

SOUTH DELTA WATER AGENCY

2509 WEST MARCH LANE, SUITE 200
POST OFFICE BOX 70388
STOCKTON, CALIFORNIA 95267
TELEPHONE (209) 474-2300
FAX (209) 474-9701

Directors:

Jerry Robinson, Chairman
Peter Alvarez, Vice-Chairman
Alex Hildebrand, Secretary
Robert K. Ferguson
Natalino Bacchetti

Counsel:

Brewer, Partridge,
Gerlomes & Herrick
Engineer:
Gerald T. Oriob

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Bob Potter	Fax (916) 653-6985
A. J. Yates	Fax (916) 654-0403
Margit Aramburu	Fax (916) 776-2293

The South Delta Water Agency submits the following comments on the two proposed Delta Protection Commission resolutions regarding San Joaquin Valley drainage which are on your July 27 agenda.

Resolution Draft A

This draft has the effect of saying that San Joaquin Valley Drainage must not be allowed to enter the western Delta via a controlled drainage conveyance system, but it may continue to enter the south Delta by uncontrolled discharge into the San Joaquin River. The draft also proposes that there be no export of agricultural drainage constituents out of the San Joaquin Valley. The salt in that drainage is greatly concentrated by crop use. However, the salt almost all originated from water delivered via the Delta Mendota Canal. It is this concentrated salt, and not the toxic ions, that have caused south Delta problems.

Evaporating the drainage to precipitate solid salt for in-valley storage is an option. However, that option would have both cost and environmental problems. It may be much more reasonable to do this only for segregated drainage containing most of the toxic ions that are leached from valley soils and then return the rest of the drainage to Delta or ocean discharge locations where the receiving waters contain the same salts at comparable concentrations.

Draft A ignores the south Delta problem and slams the door on possible acceptable options. The problem should be resolved, not stonewalled. When one doesn't approve of a city's garbage disposal system, one doesn't just propose that there be no disposal system.

Resolution Draft B

This draft is much more appropriate but should have an additional "whereas" to cite the fact that in the absence of a controlled drainage system large drainage salt loads are entering the Delta from the west side of the valley via the San Joaquin River. Some enters the river by subsurface accretion, but most enters via Salt and Mud Sloughs. It includes substantial drainage from wetlands as well as from farm lands served by the Delta Mendota Canal.

Jerry Robinson


Alex Hildebrand